EXHIBIT G

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
Civil Action: 1:15-CV-1424-WCG

VIDEOTAPE DEPOSITION OF: MATTHEW D. LYKINS, AP, IA
June 16, 2016

DANIEL MCGRAW and
SUSAN MCGRAW,
Plaintiffs,
v.
SUPERIOR AVIATION, LTD,
KUBICK AVIATION SERVICES, INC.,
and QBE INSURANCE CORP.,
Defendants.

PURSUANT TO NOTICE, the videotape deposition of MATTHEW D. LYKINS, AP, IA, was taken on behalf of the Defendant, Superior Aviation, at 1225 17th Street, Suite 2750, Denver, Colorado 80202, on June 16, 2016, at 1:01 p.m., before Ashley D. Mahe, Registered Professional Reporter and Notary Public within Colorado.

have caused a fuel pressure drop in the fuel system. I traced the lines from the fuel tanks that are in the wings as much as I could visually, and I videoed -- video documented the routing of those lines to look at not only the condition of the lines themselves, which some of those are aluminum lines and some of them are flexible lines.

I also looked at the fittings, the bulkhead fittings, and the B nuts and the fire sleeve where there is a fire sleeve to see if there were any indication of a breach in the fuel lines running from the tanks up to the engine to see if there were any additional sources of a loss of fuel pressure.

Q. Okay. The fuel line that we've been talking about that you believe became disconnected, why do you believe it became disconnected?

A. If I understand your question correctly, you're asking me what the root cause of the reason the fuel line that we're concerned about here that was identified by the FAA that was disconnected why it became disconnected.

Q. I didn't say root cause, but if that is significant to you --

A. I'm just trying to understand your question.

Q. I just asked why the line became disconnected. Do you have an opinion as to why that fuel line became disconnected?

A. I do.

Q. Okay. And what is that opinion?

A. Because it was loose.

Q. How did it become loose?

A. I don't know why it became loose or how it became loose.

Q. Okay. You don't know why it became loose or how it became loose; is that correct?

A. I do not know how it became loose. That was your question.

Q. Okay. Do you know why it became loose?

A. I don't have a specific reason why it became loose. There's many reasons why fuel lines can become loose over their lifetime, but I don't know specifically why this particular fuel line became loose.

Q. Do you know when it became loose?

A. I know that it became loose just prior to Mr. McGraw's crash.

Q. Okay. And how do you know that?

A. Because the FAA stated that the fuel line was completely disconnected at the fuel pump.

Q. Okay. Why didn't -- why didn't the fuel line disconnect on the flights before that after he picked up the aircraft from Superior? Do you have an opinion?

A. It wasn't loose enough to become disconnected.

Q. Okay. How do you know?

A. Because it didn't become disconnected.

Q. That's an assumption you're making, correct?

A. Well, I think the evidence supports that opinion.

Q. Okay. But you're not able to verify that, correct? For example, you're not able to verify that what degree of looseness there was on that connection from the first flight to the second flight to this third flight after the -- he picked it up from Superior, correct?

A. I'm not sure I understand your question, if you're looking for a specific torque value or a specific degree of tightness or looseness on the fitting, if that's your question, no. And it's because there's no evidence of an investigation or even an inspection or a check of that specific fitting from the time it left Superior's facility until the

time of the crash.

Q. Mr. Lykins, you don't know how loose that connection was at any time before this accident, correct?

A. Again, a quantitative amount of looseness, no, I do not know.

Q. Okay. You looked at the logbook entries and maintenance records for this aircraft, correct?

A. Yes, I did.

Q. Do you have an opinion as to what particular maintenance work might have loosened that connection or would have disconnected that connection?

A. Assuming that maintenance would have caused the fitting to be become loose, I can't point to a specific entry. Knowing that logbook entries are not a 100 percent documented representation of every jot and tittle of maintenance tasks that are performed on an aircraft, anytime a mechanic is in that area and manipulates a line or a fitting could potentially cause that fitting to loosen. But, again, I do not have a specific reference I could point to in the logbooks that would indicate that is when the fitting became loose.

Q. Okay. Do you even have any opinion as to work done as reflected in the entries that would have

Q. Aside from that, was there any work that they did that directly involved that fuel line that you believe came off?
A. Outside of the annual -- or annual, slash, condition inspection?
Q. That's right.
A. I don't have any documented evidence that they removed or reinstalled or loosened or tightened specifically that fuel line, other than the fact that they had -- they beared the burden before releasing that aircraft to service based off of the annual inspection that they should have been ensured that it was tight --
Q. Okay. Thanks.
A. -- prior to returning it to service.
Q. Based on your report, Mr. Lykins, do you believe that Superior or its -- the mechanics at Superior were at fault for this fuel line disconnecting?
A. I'm not so sure I understand your question. Are you -- I need to know whether or not the question is related to the mechanics who signed the logbook or all of those that were potentially involved in the work.
Q. I said Superior mechanics. So it's --

who else could it be, right?
MR. TECHMEIER: Well --
Q. (BY MR. LORINGER) I said the mechanics --
MR. TECHMEIER: -- first of all, I object to the question because it's vague and now it's argumentative on top of that.
Q. (BY MR. LORINGER) My question, Mr. Lykins, is -- we're talking about the mechanics at Superior. Okay?
A. You asked if I didn't understand a question to ask and you'd clarify.
Q. And that's what I'm --
A. So that's what I'm asking.
Q. And that's what I'm attempting to do is to clarify this.
A. Thank you.
Q. My question was about the mechanics at Superior. Okay?
A. Okay.
Q. Do you believe they were at fault for this fuel line disconnecting?
MR. TECHMEIER: Object to form of the question.
A. The answer to this question is not a

straightforward answer, and this is why, I have a strong opinion that in an organization such as Superior, especially those who have an organized maintenance program, such as an FAA 145 repair station, bears the ultimate responsibility for a situation like Mr. McGraw's and including Mr. McGraw's where an aircraft has been brought into the facility, maintenance inspection and repairs have been performed at that aircraft, and then released for return to service from that facility.
I place the ultimate blame at the end of the day on the systems, procedures, and practices of the organization, and in this case, Superior that failed Mr. McGraw, not specifically the mechanics. Unless -- and I see no evidence of this in this case, unless there was malicious and deliberate intent by a mechanic or mechanics to release an aircraft for return to service in an unsafe condition.
Q. (BY MR. LORINGER) You referenced the procedures and practices of Superior. What are you referring to?
A. Companies and organizations such as Superior Aviation who hire and employ mechanics and hold their shingle out to the public as an aircraft repair and maintenance facility. By virtue of the

fact that that's who they are, they have, whether they're formalized documented policies, procedures, and systems or informal, cultural type policies and procedures, they have a system in which the mechanics and the employees operate within to perform their duties.
Q. Are you critical of any of Superior's procedures and policies as it relates to the work they did on Mr. McGraw's aircraft?
A. Yes. In fact, every single one of my opinions started out with Superior Aviation failed or had Superior Aviation conducted.
Q. Okay. Is there a particular document you're referring to when you say procedures and policies of Superior that you're critical of?
A. I reference the entire scenario, the fact that the documents would include the logbooks stating that the aircraft was, in fact, safe for operation and airworthy and released to return to service to Mr. McGraw, and, in fact, it wasn't. So, yes, there is definitely an issue there, and I have a real problem with their policies and procedures written and formalized or informal and unwritten because this actually took place.
Q. Okay. So the policies and procedures,

have put a torque wrench on this fuel line; is that correct?

A. My opinion is the Superior mechanics should have, as stated in 43 D as well as the Lancair checklist, verified that this line fitting was properly torqued.

Q. Okay.

A. Now, in the absence of a visual indicator indicating that it has previously been torqued, then, yes, you would have to apply some sort of an instrument, typically a torque wrench, to verify as required by the checklist that that fitting is properly torqued.

Q. Could they have performed a visual inspection of that connection to satisfy those requirements?

A. Not from the evidence that I have.

Q. What do you mean by that?

A. Because the fittings, the incident fittings on that fuel pump had no visual markings such as a torque stripe or inspection lacquer stripe to indicate that it was previously properly torqued and marked to verify that it hasn't been disturbed since that proper torquing.

Q. So it's your opinion that a fuel line

like the one they believe came off on Mr. McGraw's aircraft, that a fuel line like that needs to either have a torque mark or have a torque wrench placed on it during the condition inspection to satisfy the requirements you describe in your report?

A. Those are ways that that can be done, yes.

Q. Are there any other ways?

A. Sure.

Q. What are the other ways?

A. The other ways, you can actually back the fitting off to where it's finger tight, and then the Advisory Circulars FAA provide allow you to run it finger tight with clean threads, then go one half -- one flat turn to properly torque the fitting.

Q. Okay. So that would be with a torque wrench, correct?

A. No, you do not need a torque wrench for that procedure.

Q. What would you use?

A. Proper sized wrench for that B nut.

Q. Okay. So torque wrenching using a wrench in the method you just described or torque striping would be the ways to satisfy the requirements described in your report to inspect that fuel line,

correct?

A. Or actually checking it with a torque wrench using the torque charts.

Q. Didn't I say that?

A. I thought I heard you say just with a regular wrench with the description that I just described. There are three ways.

Q. That's what I'm trying to get to. There's three ways, just so I make sure we're communicating. Your understanding of the requirement that you describe in your report are there are three ways that a proper condition inspection would be performed in terms of inspecting these fuel lines. And those three ways are the use of a torque wrench, the use of a regular wrench in the mechanism or manner you described, or the use of torque striping on that connection?

A. That's correct. That has been installed previously by someone who has verified proper torque.

Q. Those are the three ways?

A. That's correct.

Q. Okay. Can you point to any document that describes what you just said, that those three specific ways are the proper way for this to be done?

A. Yes. FAA Advisory Circular 43.13 talks

about that.

Q. What page is that on?

A. If you'll go to page 8 of my report, and starting with the paragraph about 2 inches from the bottom, as early as 1970, the administrator or the FAA has published various advisory circulars with specific guidance for aircraft technicians regarding installing and inspecting aircraft fuel hoses and lines. And then I come on down on the next page, page 9, Section 2, 43.13, speaks to fuel lines and fittings and additional inspection and repair practices for aircraft tubing systems may be found in Chapter 9, aircraft systems and components.

The next paragraph references that Chapter 9, Section 2, hydraulic systems, and it says carefully inspect all lines and fittings at regular intervals to ensure airworthiness. Inspect fittings and connections for leakage, looseness, cracks, burrs, and other damage.

And then it says the importance of the proper torque applied to all nuts and fittings in a system cannot be over-emphasized. Too much torque will damage metal seals, and too little torque will result in leaks and loose parts. The proper torque wrenches with the appropriate range should be used in